

Monte J. White and Associates
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IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
WICHITA FALLS DIVISION

IN RE:	§
	§
Robert William Raynes, Jr.	§ Case No. 09-70033-HdH-7
and	§
Betty Sue Raynes	§
DEBTORS	§

DEBTORS' RESPONSE TO MOTION OF Central Texas Land Bank, FLCA
FOR RELIEF FROM AUTOMATIC STAY

TO THE HONORABLE JUDGE OF SAID COURT:

Comes now Debtor in the above-titled cause and files this Response to Motion for Relief from Automatic Stay.

On September 14, 2009, Attorney for Central Texas Land Bank, FLCA, James Studensky, filed a Motion for Relief from Automatic Stay, in response thereto, Debtor would show the following:

1. ADMIT
2. ADMIT
3. ADMIT
4. DENY
5. DENY
6. DENY
7. DENY
8. DENY

WHEREFORE, PREMISES CONSIDERED, Debtor prays that motion be denied in all respects, that the Court award reasonable and necessary attorney fees for the defense of this Motion and for such other and further relief to which they may be entitled.

Respectfully submitted,

/s/Monte J. White
Attorney for Debtors

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Response to Motions for Relief from Stay was served by ECF and/or mailed on September 18, 2009, to the following as indicated:

/s/Monte J. White
Attorney for Debtors

Movant: Central Texas Land Bank, FLCA
P.O. Box 272
Haskell, TX 79521-0272

Attorney for Movant: James Studensky
3912 W. Waco Drive
Waco, Texas 76710

Trustee: Chapter 13 Trustee
Walter O'Cheskey
6308 Iola Ave.
Lubbock, TX 79424

U.S. Trustee
William T. Neary
1100 Commerce Street, Room 9-C-60
Dallas, TX 75242

Debtor: Robert William Raynes, Jr.
Betty Sue Raynes
300 W. Bevers
Weinert, TX 76388